

WIGGINS CHILDS
PANTAZIS FISHER
GOLDFARB PLLC
Advocates & Litigators

A PROFESSIONAL LIMITED LIABILITY COMPANY
1211 CONNECTICUT AVENUE, N.W. · SUITE 420 · WASHINGTON, D.C. 20036

Direct Dial: 202-467-4489 · Fax: 202-467-4489
Email: TFleming@wigginschilds.com · Web: www.wigginschilds.com

TIMOTHY B. FLEMING
OF COUNSEL

October 5, 2021

Via ECF

The Honorable Sarah Netburn
United States Magistrate Judge
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
40 Foley Square
New York, New York 10007

Re: *In Re Terrorist Attacks on September 11, 2001*, 1:03-md-01570 (GBD)(SN)
Ryan, et al. v. Iran, et al., 1:20-cv-0266 (GBD)(SN)

Dear Magistrate Judge Netburn:

Today, the Plaintiffs in *Ryan, et al. v. Iran, et al.*, 1:20-cv-0266 (GBD)(SN), *In Re: 9/11 Terrorist Attacks*, 1:03 MDL 1570 (GBD)(SN), are filing a motion for issuance of Letters Rogatory to facilitate diplomatic service of process upon certain Defendants in *Ryan*, specifically, the two individual high office holders and the six agency and instrumentality Defendants. Within the past few days, the *Ryan* Plaintiffs filed a similar motion, which the Court granted, and the SDNY Clerk of Court issued the Letters Rogatory. However, *Ryan* counsel realized that there was an error in the original request for issuance of the Letters Rogatory because a new Foreign Minister was recently appointed in Tehran, and he has taken office. Accordingly, we believe it necessary to make the substitution in order that the Letters Rogatory be properly issued.

We apologize for the oversight on our part and for the need to ask the Court a second time to authorize, and for the Clerk to issue again, the Letters Rogatory in this case. In preparing the papers for re-filing forthwith, we substitute the correct identity of the current Foreign Minister of Iran. We also make a few grammatical and clerical corrections, but nothing more of substance.

We thank the Court for its consideration of this Motion.

Respectfully Submitted,



Timothy B. Fleming
One of the Attorneys for the Ryan Plaintiffs

cc: All MDL counsel (via ECF)

BIRMINGHAM, AL
DELAND, FL
NASHVILLE, TN
WASHINGTON, D.C.